

TITLE VI PROGRAM

TRIENNIAL REPORT 2016 - 2018



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**CHICAGO TRANSIT AUTHORITY
TITLE VI PROGRAM
2016-2018 TRIENNIAL REPORT**

01 INTRODUCTION.....	1
02 GENERAL REQUIREMENTS.....	2
Title VI Notice to the Public.....	2
Title VI Complaint Procedures.....	2
Title VI Complaint Form.....	2
Title VI Complaints and Lawsuits.....	2
Public Participation Plan.....	2
Language Assistance Plan.....	4
Chicago Transit Board / ADA Advisory Committee Membership.....	26
Monitoring of Sub-Recipients.....	27
Documentation of Board Review and Approval of Title VI Program Triennial Report.....	27
03 SERVICE STANDARDS AND POLICIES	27
Overview and Objectives.....	27
Service Standards	27
Vehicle Load Standard.....	27
Vehicle Headway Standard.....	28
On-Time Performance Standard	28
Bus Network	29
Rail Network	29
Service Availability Standard	29
Service Policies	29
Transit Amenities Policy	29
Vehicle Assignment Policy.....	30

Changes to Key Route Bus Network	30
04 MONITORING OF SERVICE STANDARDS AND POLICIES.....	31
Overview.....	31
Service Standards	31
Vehicle Load Monitoring	31
Bus Load Monitoring and Findings	31
Rail Load Monitoring and Findings	32
Vehicle Headway Monitoring	32
Bus Headway Monitoring and Findings.....	32
Rail Headway Monitoring and Findings.....	33
On-Time Performance Monitoring.....	33
Bus Network Monitoring and Findings.....	33
Rail Network Monitoring and Findings.....	34
Service Availability Monitoring and Findings	34
Service Policies	35
Transit Amenities Distribution	35
Vehicle Assignment Distribution	35
05 DEMOGRAPHIC ANALYSIS	37
Current Service Profile.....	37
Demographic Ridership and Fare Payment.....	37
Facilities.....	37
06 PUBLIC ENGAGEMENT PROCESS FOR MAJOR SERVICE CHANGE POLICY	38
07 SERVICE AND FARE EQUITY ANALYSES	38
Executive Summary	38
08 TITLE VI PROGRAM CONCLUSIONS / GOALS LOOKING HEAD.....	38

LIST of TABLES

Table 1: LEP Population: Ability to Speak English	6
Table 2: LEP Population: Language Spoken at Home.....	6
Table 3: LEP Population: Ability to Speak English by Language Category (number)	11
Table 4: LEP Population: Ability to Speak English by Language Category (percent share of total)	12
Table 5: LEP Population: Ability to Speak English by Citizenship Status (number)	12
Table 6: LEP Population: Ability to Speak English by Citizenship Status (percent share of total)	13
Table 7: LEP Population: Linguistic Isolation by Language Category (number)	13
Table 8: LEP Population: Linguistic Isolation by Language Category (percent share in total)	14
Table 9: Chicago Transit Board and ADA Advisory Committee Membership	26
Table 10: Bus Load Monitoring	31
Table 11: Rail Load Monitoring	32
Table 12: Bus Network Headway Monitoring	32
Table 13: Rail Headway Monitoring.....	33
Table 14: Bus On-Time Performance Monitoring	33
Table 15: Rail On-Time Performance Monitoring	34
Table 16: Service Availability Monitoring	35
Table 17: Bus and Rail Vehicle Assignment Monitoring (Average Age).....	35

FIGURES

- Figure 1: Six County Region
- Figure 2: Linguistic Isolation by Language-Spanish
- Figure 3: Linguistic Isolation by Language-Indo-European
- Figure 4: Linguistic Isolation by Language-Pacific Islander

APPENDICES

- Appendix A: Title VI Notice to the Public
- Appendix B: Administrative Procedure 1602 and Online Title VI Policy
- Appendix C: Title VI Complaint Form
- Appendix D: Title VI Complaints and Lawsuits: 2016, 2017, And 2018
- Appendix E: Previous Board Review and Approval of Title VI Program
- Appendix F: Service Standards, Policies, and Operations
- Appendix G: Transit Amenities Distribution
- Appendix H: RTA Customer Satisfaction Survey
- Appendix I: Recent, In Progress and Planned Facilities
- Appendix J: Service and Service Areas with Minority and Low Income Populations
- Appendix K: Fare Changes and Fare Equity Analysis -2017/2018
- Appendix L: Board Ordinance Approval for Fare Changes 2018
- Appendix M: Board Ordinance Title VI Program Triennial Report 2020

01 INTRODUCTION

The Chicago Transit Authority (CTA) is submitting this update for years 2016, 2017 and 2018 in accordance with FTA Title VI Circular 4702.1B issued October 1, 2012. The documentation requirements of FTA Title VI Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients", for years 2016, 2017, and 2018 have been followed and are available for review.

This report adheres to the Title VI Program Checklist as stated in FTA Title VI Circular 4702.1B which includes both General Requirements and Requirements of Transit Providers.

The CTA is committed to providing equal opportunity and service equity to its customers as protected by Title VI of the Civil Rights Act of 1964 ("Title VI"). This commitment means that the CTA does not discriminate on the basis of race, color and national origin.

CTA submits a Title VI Program Triennial Report update every three years and reviews and monitors on a three year cycle as stated in FTA Title VI Circular 4702.1B.

02 GENERAL REQUIREMENTS

Title VI Notice to the Public

CTA posts its Title VI Notice to the Public on CTA's website at <http://www.transitchicago.com/about/title6.aspx>. Additionally, CTA has posted a notice in all of its vehicles both rail and bus, in all CTA rail stations, and in the lobby of CTA's headquarters. A sample of CTA's Title VI rail station notice can be found in Appendix A.

Title VI Complaint Procedures

CTA has developed a complaint procedure and form for any person who believes she or he has been discriminated against on the basis of race, color, or national origin.

CTA's internal document, Administrative Procedure 1602 ("AP 1602"), addresses the procedure on how to file a Title VI complaint and provides detailed information on how CTA will process a complaint once it is received.

CTA's AP 1602 and online Title VI Policy can be found in Appendix B. The online Title VI Policy is also available to the public at <http://www.transitchicago.com/about/title6.aspx>.

Title VI Complaint Form

CTA's Title VI Complaint Form can be found in Appendix C, and is also available online at <http://www.transitchicago.com/about/title6.aspx>.

Title VI Complaints and Lawsuits

CTA's Customer Service Department received about 50,000 complaints annually or approximately 150,000 complaints during the three-year reporting period. Title VI related complaints were routed from the Customer Service Department to the Title VI Coordinator. The complaint breakdown was as follows: 2016 = 85, 2017 = 178, and 2018 = 350 for a total of 613 Title VI Complaints received during this reporting period. Appendix D provides a record of the complaints received and a break down in status, and provides information on any lawsuits filed.

In 2017, CTA created the position of Title VI Coordinator to handle and oversee the day-to-day operation of the Title VI Program. As part of this initiative, CTA also developed and implemented a formal Title VI complaint and investigation process, which has allowed us to centralize all Title VI complaint records. Specifically, the Title VI Coordinator is responsible for investigating, tracking and monitoring all Title VI complaints and any action taken in response to investigation findings.

Public Participation Plan

A process for obtaining and considering public comment prior to a fare increase or service change has been established. This process is documented in Chapter 4, Section 57 of the CTA By-Laws, Rules and Regulations, and Rules of Order. These by-laws are distributed to all Chicago Transit Board members upon joining the Board and are one of the governing documents of the Chicago Transit Board. In addition, effective January 2004, the Chicago Transit Board provides the opportunity for public comments at every monthly meeting.

A service equity analysis will be conducted whenever the Authority implements a major service change to the rail or bus system, as defined in the Service and Fare Equity Policy and Analysis. A major service change to the rail or bus system is defined as the addition of, or reduction in, more than ten percent (10%) of the rail or bus system's riders or vehicle revenue hours through one or more route changes that would remain in effect in excess of twelve (12) months. The Chicago Transit Board considers public comment prior to making a final determination on the proposed service changes and/or fare increases. Public hearing requirements are set by ordinance, and state that a 14-day notice of intent to hold the public hearing is needed prior to the hearing.

Notice of the public hearing and description of the proposed service changes and/or fare increases are posted in various locations to provide an opportunity for elected officials, customers and concerned citizens to attend. The notice is posted in general and neighborhood-oriented newspapers, outside the Board office, on car cards on bus routes and rail lines affected, and on the CTA website. Elected officials are informed of the public hearing. A press release is also distributed. Information related to the public hearing is translated into the appropriate language(s) based on the composition of the targeted area. The most common languages translated are Spanish, Polish, and Chinese.

In addition to public hearings, there are other ways in which customers can provide feedback on fare and service changes. Customers can call 1-888-YOUR-CTA, email to feedback@transitchicago.com or write to the CTA c/o Customer Service Department or the Assistant Secretary of the Chicago Transit Board, 567 W. Lake St., Chicago, IL 60661, to document their concerns or feedback. A phone number is also designated for customers who are hearing impaired.

The Customer Service Department's call center, which also provides general CTA information, logs customer feedback and directs the information to the appropriate departments. Spanish speaking customer representatives are available and the Language Line Services has the ability to translate in approximately 170 languages for customers who request an interpreter. CTA established a Facebook page and a Twitter account and customers are encouraged to leave feedback on both of these social media sites.

The different ways of contacting the CTA are posted on the website, throughout the bus and rail system, and printed on the CTA System Map and in advertising material. The Automatic Voice Announcement System (AVAS) on buses periodically mentions the CTA website and phone number. CTA previously aired a monthly television show, *Connections*, which provided information on CTA activities to educate and inform current and potential customers about CTA services. All episodes of *Connections* are now uploaded to CTA's YouTube page for customers to view. In addition, CTA publishes new content directly to YouTube including board meetings and other content such as real-time videos along the length of each rail line so that customers can take a virtual trip and know what to expect before taking their actual trip.

Customer input and feedback are vital to ensuring that CTA, as a public service, meets the needs of our customers. Comments received are taken into consideration as part of the recommendations presented to the Chicago Transit Board prior to a final determination regarding fare changes and/or service changes.

03 Language Assistance Plan

Introduction

CTA is committed to serving individuals who may require language assistance and supports the goals established by the Federal Transportation Administration (FTA) to provide meaningful access to its transit services. The LAP includes measures that are currently provided by CTA, as well as CTA's language assistance initiatives that are proposed for the future. The plan is based, in part, on an in-depth language study which was designed to reduce barriers to transit usage by individuals who may require language assistance.

Title VI requirements includes Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" and U.S. DOT "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons", CTA conducted its "Limited English Proficiency Study" ("LEP Study") in the summer of 2019.

Individuals who do not speak English as their primary language and have a limited ability to read, write, speak, or understand English are characterized as limited English proficient, or "LEP." According to the 2000 U.S. Census, more than 10 million people reported that they do not speak English at all, or do not speak English well.

Public transit is a key means of achieving mobility for many LEP persons. The 2013-2017 U.S. Census also reported that more than 10 percent of LEP persons (ages 16 years and over) use public transit as their primary means of transportation to their place of employment. Comparatively, 5 percent of English speakers reported public transit as their primary means of transportation. Language assistance measures allow agencies to provide safe, reliable, convenient, and accessible services to LEP persons. These efforts attract riders who might otherwise be excluded from utilizing the service because of language barriers.

Background

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, and national origin under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disparate impact on LEP persons because such conduct constitutes national origin discrimination.

Executive Order 13166 ("Order"), "Improving Access to Services for Persons with Limited English Proficiency," was issued on August 11, 2000. The Order directs each Federal agency that provides financial assistance to non-Federal entities to examine the services that they offer, and then to develop and implement a system that provides meaningful access to LEP persons for those services. President Bush affirmed his commitment to the Order through a memorandum issued on October 26, 2001 by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. The memorandum directed Federal agencies to provide guidance and technical assistance to Federal funding recipients as to how they can make meaningful access to their services available to LEP persons.

Accordingly, the U.S. Department of Transportation (“DOT”) developed guidance for recipients and subsequently published a document, DOT Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries (“DOT LEP Guidance”) on December 14, 2005. This document both clarifies the responsibilities of Federal funding recipients and provides guidance on best practices for serving LEP populations in accordance with statutory and regulatory requirements.

The DOT LEP Guidance recommends that all recipients, especially those serving large LEP populations, develop and implement a plan to address the needs of the LEP populations that they serve. According to the DOT LEP Guidance, an effective plan should cover the following five elements: 1) identifying LEP persons who need language assistance; 2) providing language assistance measures; 3) training staff; 4) providing notice to LEP persons; and 5) monitoring and updating the plan.

The FTA references the DOT LEP Guidance in FTA C 4702.1B. Chapter III, Part 9 of the Title VI Circular reiterates the requirement to ensure meaningful access to benefits, services, and information for LEP persons. It also requires that Federal funding recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP Guidance.

Four-Factor Analysis

Based on the previous version of the Title VI Circular, CTA conducted the “Limited English Proficiency Study” (“LEP Study”) in 2019. The LEP Study used data from the 2013-2017 American Community Survey, which represents 3,488,072 households, 7,687,641 individuals, and 487,668 LEP persons for the 6-County Chicago metropolitan region (Cook, Du Page, Kane, Lake, McHenry, and Will). The purpose of the LEP Study was to collect data and conduct outreach efforts in order to identify the predominant languages spoken, determine the level of transit use, and identify whether or not LEP status presents an obstacle to transit use.

Geographically, the LEP Study accounted for Cook County, Illinois (“LEP Study Area”). The LEP Study analyzed the seven foreign language-speaking LEP groups that represented the highest concentrations within the LEP Study Area: English, Spanish, Polish, and Chinese. The data garnered from the LEP Study helps to inform CTA’s language assistance decision making process in an ongoing manner with regards to four specific factors:

- (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient;
- (2) The frequency with which LEP persons come into contact with the program;
- (3) The nature and importance of the program, activity, or service provided by the program to people’s lives; and
- (4) The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient

CTA conducted a LEP Study in 2019 which included a Four-Factor Analysis¹. The following sources are used to evaluate this Factor:

2013-2017 Census Bureau's American Community Survey

A primary data source identified in the FTA Handbook for the purposes of LEP Factor 1 analysis is the American Community Survey ("ACS"), a monthly survey conducted by the US Census Bureau. The following tables present data on the LEP population in the 938 census tracts, reflecting CTA's service area. The top five languages spoken in Cook County are Spanish; Polish; Arabic; Filipino/Tagalog; and Chinese.

Table 1 presents data from the ACS on the entire population's ability to speak English. The last column presents the data on the limited English proficient population that is the combined totals of those individuals who either do not speak English well or do not speak English at all. All data are limited to the population five years or older. For the population five years of age and older in the CTA service area, 8.1 percent are LEP and self-identify as speaking English less than well, which is shown in Table 1. While only 2.3 percent speak no English whatsoever, a much larger group comprehends some level of English but still struggles with communicating in English.

Table 1: LEP Population: Ability to Speak English

	Total	Speak English Only	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (< Well)
Number	3,154,751	1,989,941	686,159	223,141	183,304	72,206	255,510
Percent	100.00%	63.1%	21.8%	7.1%	5.8%	2.3%	8.1%

CHA analysis of American Community Survey data 2013-2017 5-year sample

Table 2 indicates the distribution of this population across the 106 non-English languages spoken in Cook County.

Table 2: LEP Population: Language Spoken at Home

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Spanish	1,012,544	58.7%	58.7%
Polish	139,275	8.1%	66.8%

¹ The firm Colette Holt and Associates (CHA) conducted the 2019 LEP Study

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Arabic	49,659	2.9%	69.7%
Filipino, Tagalog	48,587	2.8%	72.5%
Chinese	38,119	2.2%	74.7%
Urdu	27,759	1.6%	76.3%
Russian	27,327	1.6%	77.9%
Korean	26,975	1.6%	79.5%
Gujarathi	25,295	1.5%	81.0%
Greek	22,460	1.3%	82.3%
Hindi	20,737	1.2%	83.5%
Italian	19,162	1.1%	84.6%
French	18,394	1.1%	85.6%
Cantonese	15,244	0.9%	86.5%
Niger-Congo regions (many subheads)	14,850	0.9%	87.4%
Ukrainian, Ruthenian, Little Russian	13,292	0.8%	88.2%
Rumanian	13,081	0.8%	88.9%
German	12,542	0.7%	89.7%
Vietnamese	11,157	0.6%	90.3%
Near East Arabic dialect	10,576	0.6%	90.9%
Serbian	8,955	0.5%	91.4%
Bulgarian	8,483	0.5%	91.9%
Malayalam	8,483	0.5%	92.4%
Mandarin	8,202	0.5%	92.9%
Telugu	8,052	0.5%	93.4%
Japanese	7,738	0.4%	93.8%

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Bosnian	6,732	0.4%	94.2%
Lithuanian	6,553	0.4%	94.6%
Albanian	5,736	0.3%	94.9%
Tamil	5,509	0.3%	95.2%
Persian, Iranian, Farsi	5,082	0.3%	95.5%
Hebrew, Israeli	4,198	0.2%	95.8%
Thai	4,156	0.2%	96.0%
Turkish	3,829	0.2%	96.2%
French or Haitian Creole	3,751	0.2%	96.4%
Amharic, Ethiopian, etc.	3,543	0.2%	96.7%
Croatian	3,475	0.2%	96.9%
Bengali	3,396	0.2%	97.1%
Portuguese	3,057	0.2%	97.2%
Panjabi	2,756	0.2%	97.4%
Nepali	2,622	0.2%	97.5%
Pakistan nec	2,165	0.1%	97.7%
Mongolian	1,968	0.1%	97.8%
Czech	1,866	0.1%	97.9%
Magyar, Hungarian	1,792	0.1%	98.0%
Armenian	1,702	0.1%	98.1%
Marathi	1,699	0.1%	98.2%
India nec	1,623	0.1%	98.3%
Bantu (many subheads)	1,619	0.1%	98.4%
Dutch	1,502	0.1%	98.5%

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Other specified African languages	1,481	0.1%	98.6%
Cushite, Beja, Somali	1,452	0.1%	98.6%
Mon-Khmer, Cambodian	1,419	0.1%	98.7%
Serbo-Croatian, Yugoslavian, Slavonian	1,401	0.1%	98.8%
Sebuano	1,147	0.1%	98.9%
Other Afro-Asiatic languages	1,109	0.1%	98.9%
Chinese, Cantonese, Min, Yueh	1,012	0.1%	99.0%
Kannada	971	0.1%	99.0%
Laotian	964	0.1%	99.1%
Swedish	944	0.1%	99.2%
Slovak	893	0.1%	99.2%
Irish Gaelic, Gaelic	863	0.1%	99.3%
Other Asian languages	839	0.0%	99.3%
Malay	753	0.0%	99.4%
Other Indo-Iranian languages	699	0.0%	99.4%
Other n.e.c.	697	0.0%	99.4%
Jamaican Creole	605	0.0%	99.5%
Yiddish, Jewish	605	0.0%	99.5%
Norwegian	596	0.0%	99.5%
Other Indo-European languages	592	0.0%	99.6%
Burmese, Lisu, Lolo	559	0.0%	99.6%
Lettish, Latvian	530	0.0%	99.6%
Karen	524	0.0%	99.7%
Macedonian	479	0.0%	99.7%

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Swahili	463	0.0%	99.7%
Pashto, Afghan	401	0.0%	99.7%
Danish	340	0.0%	99.8%
Indonesian	337	0.0%	99.8%
Other specified American Indian language	327	0.0%	99.8%
Mande	316	0.0%	99.8%
Llocano, Hocano	306	0.0%	99.8%
Finnish	290	0.0%	99.9%
Nilo-Saharan, Fur, Songhai	284	0.0%	99.9%
Tibetan	248	0.0%	99.9%
Sinhalese	214	0.0%	99.9%
Afrikaans	203	0.0%	99.9%
Other English-based Creole languages	202	0.0%	99.9%
South/Central American Indian	192	0.0%	99.9%
Kurdish	174	0.0%	99.9%
Miao, Hmong	134	0.0%	100.0%
Swiss	133	0.0%	100.0%
Dari	115	0.0%	100.0%
Hawaiian	108	0.0%	100.0%
Aztecan, Nahuatl, Uto-Aztecan	100	0.0%	100.0%
Chin languages	81	0.0%	100.0%
Muskogean	53	0.0%	100.0%
Kiowa	45	0.0%	100.0%
Ojibwa, Chippewa	38	0.0%	100.0%

Language Spoken at Home	Number of People	Percent of Total Population	Cumulative Percent of Population
Dakota, Lakota, Nakota, Sioux	32	0.0%	100.0%
Tongan	29	0.0%	100.0%
Fulani	28	0.0%	100.0%
Other Malayan	25	0.0%	100.0%
Cherokee	23	0.0%	100.0%
Pennsylvania Dutch	14	0.0%	100.0%
Cape Verdean Creole	14	0.0%	100.0%
Lu Mien	12	0.0%	100.0%
Total	1,723,694	100.00%	

CHA analysis of American Community Survey data 2013-2017 5-year sample

Table 3: LEP Population: Ability to Speak English by Language Category (number)

	Total	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (< Well)
Spanish	755,737	449,314	127,930	126,224	52,269	178,493
Indo-European	226,964	135,555	50,105	32,324	8,980	41,304
Asian/Pacific Islander	125,461	66,479	31,844	18,549	8,589	27,138
Other	56,648	34,811	13,262	6,207	2,368	8,575
Total	1,164,810	686,159	223,141	183,304	72,206	255,510

CHA analysis of American Community Survey data 2013-2017 5-year sample

Table 4: LEP Population: Ability to Speak English by Language Category (percent share of total)

	Total	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population (< Well)
Spanish	100.00%	59.5%	16.9%	16.7%	6.9%	23.6%
Indo-European	100.00%	59.7%	22.1%	14.2%	4.0%	18.2%
Asian/Pacific Islander	100.00%	53.0%	25.4%	14.8%	6.8%	21.6%
Other	100.00%	61.5%	23.4%	11.0%	4.2%	15.1%
Total	100.00%	58.9%	19.2%	15.7%	6.2%	21.9%

CHA analysis of American Community Survey data 2013-2017 5-year sample

In **Tables 5 and 6**, the data on ability to speak English are grouped by the respondent's citizenship status.

Table 5: LEP Population: Ability to Speak English by Citizenship Status (number)

	Total	Speak English Only	Speak Spanish; Speak English Very Well	Speak Spanish; Speak English Less Than Very Well	Speak Other; Speak English Very Well	Speak Other; Speak English Less Than Very Well	Speak English Less Than Very Well
US-born Citizens	2,433,756	1,918,647	348,160	59,813	95,314	11,822	71,635
Naturalized Citizen	384,825	27,687	52,500	175,602	54,687	74,349	249,951
Not Citizen	3,154,751	1,989,941	449,314	306,423	236,845	172,228	478,651
Total	2,433,756	1,918,647	348,160	59,813	95,314	11,822	71,635

Table 6: LEP Population: Ability to Speak English by Citizenship Status (percent share of total)

	Total	Speak English Only	Speak Spanish; Speak English Very Well	Speak Spanish; Speak English Less Than Very Well	Speak Other; Speak English Very Well	Speak Other; Speak English Less Than Very Well	Speak English Less Than Very Well
US-born Citizens	100.0%	78.8%	14.3%	2.5%	3.9%	0.5%	2.9%
Naturalized Citizen	100.0%	13.0%	14.5%	21.1%	25.8%	25.6%	46.7%
Not Citizen	100.0%	7.2%	13.6%	45.6%	14.2%	19.3%	65.0%
Total	100.0%	63.1%	14.2%	9.7%	7.5%	5.5%	15.2%

CHA analysis of American Community Survey data 2013-2017 5-year sample

Tables 7 and 8 present data on the degree that a household is linguistically isolated. A linguistically isolated household is defined as a household where no one in the household 14 years or older speaks English only at home or no one in the household 14 years or older speaks English very well.

Table 7: LEP Population: Linguistic Isolation by Language Category (number)

	Total	Not Linguistically Isolated	Linguistically Isolated
Spanish	755,737	615,038	140,699
Indo-European	226,964	172,489	54,475
Asian/Pacific Islander	125,461	92,996	32,465
Other	56,648	43,126	13,522
Total	1,164,810	923,649	241,161

CHA analysis of American Community Survey data 2013-2017 5-year sample

Table 8: LEP Population: Linguistic Isolation by Language Category (percent share of total)

	Total	Not Linguistically Isolated	Linguistically Isolated
Spanish	100.0%	81.4%	18.6%
Indo-European	100.0%	76.0%	24.0%
Asian/Pacific Islander	100.0%	74.1%	25.9%
Other	100.0%	76.1%	23.9%
Total	100.0%	79.3%	20.7%

CHA analysis of American Community Survey data 2013-2017 5-year sample

Factor 2: The frequency with which LEP individuals come in contact with the program

CTA conducted a LEP Study in 2019 which included a Four-Factor Analysis². The following sources are used to evaluate this Factor:

- **CTA Customer Facing Employee Interviews**
- **Group interviews with LEP stakeholder organizations**
- **CTA internal staff interviews**

48 customer facing bus and rail employees participated in 6 group interview meetings. The following topics were discussed and reviewed:

How often are you asked for assistance by LEP individuals?

What services are available to assist LEP riders?

Have you been asked to translate signage for LEP riders?

How often do LEP individuals ask you for directions?

How often do LEP individuals ask you for printed materials in their native language, *i.e.*, timetables?

How are assistance requests from LEP riders tracked?

Do you think the services for LEP riders are adequate, including in emergency situations?

What do you think are the biggest obstacles for LEP riders?

What suggestions do you have for improving access for LEP riders?

The following is a summary of common responses:

- Many reported interacting with LEP individuals on a regular basis. The frequency of how often a customer facing employee came in contact with an LEP individual depended on the route.
- Spanish and Polish speaking customers who did not speak English were the most common languages. This was followed by people who spoke a Chinese language.
- Three different groups of non-English speaking riders were identified: tourists, elderly non-English speaking persons and younger non-English speaking persons.

Additional Interviews with LEP Stakeholder Groups

CTA's LEP Consultancy firm, CHA interviewed LEP stakeholder groups that directly serve LEP customers. They researched stakeholder organizations representing populations speaking Spanish, Polish, Chinese, Korean, Russian, Arabic, Portuguese, Assyrian, Japanese, Thai, Vietnamese, Punjabi, Hindu, Farsi, other Indo-European Languages, and other Slavic languages.³ These organizations were invited to group interviews to share their experiences and make recommendations for improving access to CTA's services for their constituents.

² The firm Colette Holt and Associates (CHA) conducted the 2019 LEP Study

³ CHA interviewed a total of 19 representatives from the following Community Stakeholder Groups:

1) Alivio Medical Center, 2) CALOR AHF Affiliate HIV Testing, 3) Central States SER, 4) Coalition for a Better Chinese American Community, 5) El Valor, El Rincon Family Services, 6) Family Focus, Howard Area Community Center, 7) Hana Center, Mexican Fine Arts Museum, North, 8) River Commission, Polish American Association, 9) El Hogar del Niño, Northwest Side Housing Center, 10) The Resurrection Project, Urhai Community Service Center.

Among the attendees at the LEP community stakeholder interviews were:

A representative from a qualified health center.

An executive director of a HIV & AIDs prevention center.

A manager for an employment services center.

The executive director of a faith, business and social service organization for the Chinese community.

A representative of a workforce development employment agency.

A representative of a mental health, substance use, re-entry, a recidivism reduction for youth center.

A representative from a center that provides job seeker training, counseling and English as a Second Language ("ESL") services for the Korean community.

A coordinator from an economic development and housing agency that provides housing and education assistance.

An employee from the Polish American Association that provides adult education for employment, social services, counseling and immigration services.

A case manager for a community organization that provides early childhood programs.

An employee from a community organization that provides immigration, health and housing assistance.

A representative from a group that provides home care and assistance to the elderly in the Assyrian Community.

The executive director and founder of a community center offering homemaker services and Medicare Transportation.

A family services coordinator from a day care and social services agency.

A representative from a community organization for housing and organizing education.

The following topics were discussed and reviewed with Community Stakeholder representatives:

How do LEP individuals learn how to use the CTA system?

What are barriers to transit use the LEP individuals that you serve?

How do LEP individuals currently travel? What is their main mode of transportation?

- How do LEP individuals obtain information on various aspects of CTA communication? What is the importance of each of these: Line, station, and schedule information?
- Fare Payment
- Schedule changes (temporary and permanent)
- Unforeseen/ Emergency service interruptions
- Transfers between other transit modes
- ADA accessibility
- Safety
- Public hearings/ Public involvement processes
- CTA website

Effectiveness of CTA's current communications efforts

What resources do LEP individuals rely on for information on other public services?

How do LEP individuals file complaints? Do they know how to do so?

Which methods of communication do you feel would be most useful?

- Print materials in other languages
- Verbal communication in other languages
- Nonverbal communications (symbols, etc.)

CTA Internal Staff Interviews

CHA interviewed 11 CTA staff members from the following departments: Emergency Preparedness, Talent Acquisition, Planning and Scheduling, Diversity Business Enterprise, Recruiting, Title VI and Affirmative Action, Legislative Affairs, Compensation Planning, Service Planning, Revenue and Fare Systems.

The following topics were discussed and reviewed:

How do LEP individuals learn how to use CTA?

What barriers do CTA LEP riders face?

How do LEP individuals obtain information on various aspects of CTA?

- Line, station, and schedule information
- Fare Payment
- Schedule changes (temporary and permanent)
- Unforeseen/ emergency service interruptions
- Transfers between other transit modes
- ADA accessibility
- Safety
- Public hearings/ public involvement processes
- CTA Title VI website

How do LEP individuals file complaints with CTA?

In-depth discussion and suggestions for improving LEP access to CTA.

Factor 3: The nature and importance of the program, activity or service provided by the recipient to people's lives.

DOT LEP Guidance notes that providing public transportation access to LEP persons is crucial, as denial or delay of access to such services could have serious or even life-threatening implications for LEP populations. An LEP individual's inability to utilize public transportation effectively may adversely affect her or his ability to access health care, education, or employment.

CTA recognizes the significance of transit services and it is that consideration which underscores CTA's commitment to accommodating LEP populations. CTA reviews survey data from a number of different perspectives and, on an ongoing basis, uses it to assess a variety of transit service provisions. Independent of language considerations, CTA sorts and monitors data relating to portions of the CTA Service Area that contain high concentrations of transit-dependent households. If a particular portion of the CTA Service Area has both a high concentration of a specific LEP group as well as a high percentage of transit-dependent households, then CTA considers those factors together when making translation service decisions.

CTA conducted an LEP study in 2019 to evaluate this Factor with these data sources:

- CTA Customer Facing Employee Interviews
- Group interview with LEP stakeholder organizations
- CTA Internal staff interviews
- Interview with Cubic/ Ventra call center staff

CTA Customer Facing Employee and LEP Stakeholder Organizations Interview Summary:

As described for Factor 2, 48 customer facing bus and rail employees were interviewed, along with nineteen LEP stakeholder organizations.

Employees reported that LEP individuals regularly use CTA rail and bus services. LEP stakeholder organizations report that LEP individuals frequently use CTA bus and rail services and these services are important to their lives.

The 2019 LEP study underscores the importance of the CTA service to LEP communities and CTA's commitment to serve LEP populations.

1 The consulting firm Colette Holt and Associates (CHA) led the study also using American Community Survey data

Factor 4: Determine the resources available to the recipient and costs

CTA balances a variety of factors when making language assistance determinations. As a result of the LEP Study and other supplemental analyses, CTA has determined that, for system-wide projects, translation services will be provided as needed for the two LEP language populations with the highest percentages in the overall CTA Service Area. Currently, the most recently available survey data shows that those LEP populations are Spanish and Polish-speaking groups.

Non-system wide projects which affect only a specific and limited portion of the CTA Service Area are administered in a different manner. First, CTA derives a standard by calculating the total population located within the entire CTA Service Area. CTA then determines what percentage of that total population are LEP persons. Once established, that number serves as a benchmark (“LEP Benchmark”) to be used later in the analysis.

Then, CTA considers the specific populations likely to be impacted by the non-system wide project. To that end, adjacent census tracts that are within a quarter mile radius of the project site are identified (“Impacted Census Tracts”). CTA assesses the LEP group concentrations within the Impacted Census Tracts. If an LEP group concentration within an Impacted Census Tract meets or exceeds the threshold previously established as the LEP Benchmark, then CTA will provide translation services as needed.

In this manner, the standard by which individual census tracts are measured is set by a number that is derived from the sum total of all census tracts that comprise the CTA Service Area.

When using the most recently available survey data with this methodology, the analysis shows that 10.2 percent is the current LEP Benchmark. Spanish, Polish, and Chinese speaking LEP populations are the three language groups that either meet or exceed 10.2 percent in some of the CTA Service Area census tracts at this time. CTA balances the type and extent of translation service outreach to be provided with the resources available pursuant to the budget of each individual project.

The 2019 LEP Study evaluated this Factor. The study examined both interpretation and translation services at CTA both systemwide and at identified locations with high LEP populations. The Study identified opportunities to utilize available resources to serve LEP populations such as opportunities to provide translated signage.

Additional Customer Outreach Efforts

Customer notices that are posted throughout CTA's transit system and this represents one example of an area that is experiencing improvements. These notices typically regard construction impacts, reroutes, or other service changes. CTA introduced new, redesigned, more easily understandable alerts that utilize mode icons, larger route numbers, and increased use of maps to augment text. These measures were designed to communicate information in a more simple, direct, and graphical manner for customers.

Some signage improvements and updates were made throughout the rail system in order to improve consistency and incorporate the colors of the rail lines. These measures make it easier for all customers to navigate the transit system during trips.

Signage standards were also revised to decrease the amount of text on signs, to place greater emphasis on proper names and terminals for navigation, and to greatly increase the use of symbols and icons for easier use and quicker cognition. These measures serve to decrease barriers for all passengers, including LEP persons. They are also representative of the types of actions that CTA takes, in addition to other studies, surveys, and analyses, in order to accommodate customers efficiently and effectively.

CTA continues to monitor the needs of LEP customers, evaluate feedback, and tailor services accordingly. Below is a sample list with some of the language assistance services that CTA provides.

CTA System Map: Each year, the CTA updates and publishes a translated System Map.

Overnight Service Brochure: A translated version of the "Night Owl" (overnight) service brochure is published.

Customer Service: Bilingual Customer Service Representatives (Spanish) are available to customers via an immediate prompt through CTA's Customer Service Department at 1-888-YOUR-CTA. On-call translation services in approximately 170 languages are also available upon customer request.

Website Translation and Online Language Guides: CTA's website has language guides for the three most commonly spoken LEP languages in the CTA Service Area: Spanish; Polish; and Chinese with links to Google Translate® for translation in additional languages.

Interpreters: Spanish, Polish, and Chinese speaking interpreters (as appropriate) are utilized at CTA community meetings and public hearings.

Customer Alerts and Notices: Translation services for items like customer alerts regarding public meetings, permanent route changes or discontinuations, or major temporary service changes may be provided depending on CTA's analysis of the language assistance needs of the affected census tracts.

Notice to LEP Persons Regarding Language Assistance Availability

CTA notifies LEP persons of its services through various means. CTA distributes and posts translated materials throughout the transit system as well as on the CTA website. CTA also distributes materials to elected officials' offices, libraries, and other community groups to spread awareness.

Next Steps

Through the 2019 LEP Study, CTA has identified additional opportunities to enhance communications with LEP persons, such as:

- 1) **Reviewing Title VI Notices at all bus and rail stations and providing translations where appropriate.**
- 2) **Continue Signage and Communication Improvements.**
As previously referenced, the Authority has begun the process of moving away from wordy signs. New signs will offer more pictures that provide information about directions, what to do in case of an emergency, while offering improved guidance to both English and LEP customers.
- 3) **Enhancing CTA's Title VI website to incorporate additional user friendly and LEP features.**
- 4) **Improvements to CTA's fare system (Ventra) for LEP persons.**
- 5) **Enhanced Support for Front-Line Employees.**
- 6) **Additional Engagement with LEP Community Stakeholders**

Monitoring and Oversight of Language Assistance Plan

CTA will continue to monitor, evaluate, and update the LAP based on the most recently available annual American Community Survey data for the CTA Service Area, multiple points of customer feedback, and additional ongoing customer service measures.

Specifically, since the overall LEP population within the CTA Service Area fluctuates, the data is updated with regularly. To that end, CTA uses the most recently available American Community Survey data to recalculate the LEP populations of each individual census tract. By its nature, this action reestablishes a new LEP Benchmark to be used for future language assistance decision making by CTA.

Figure 1:

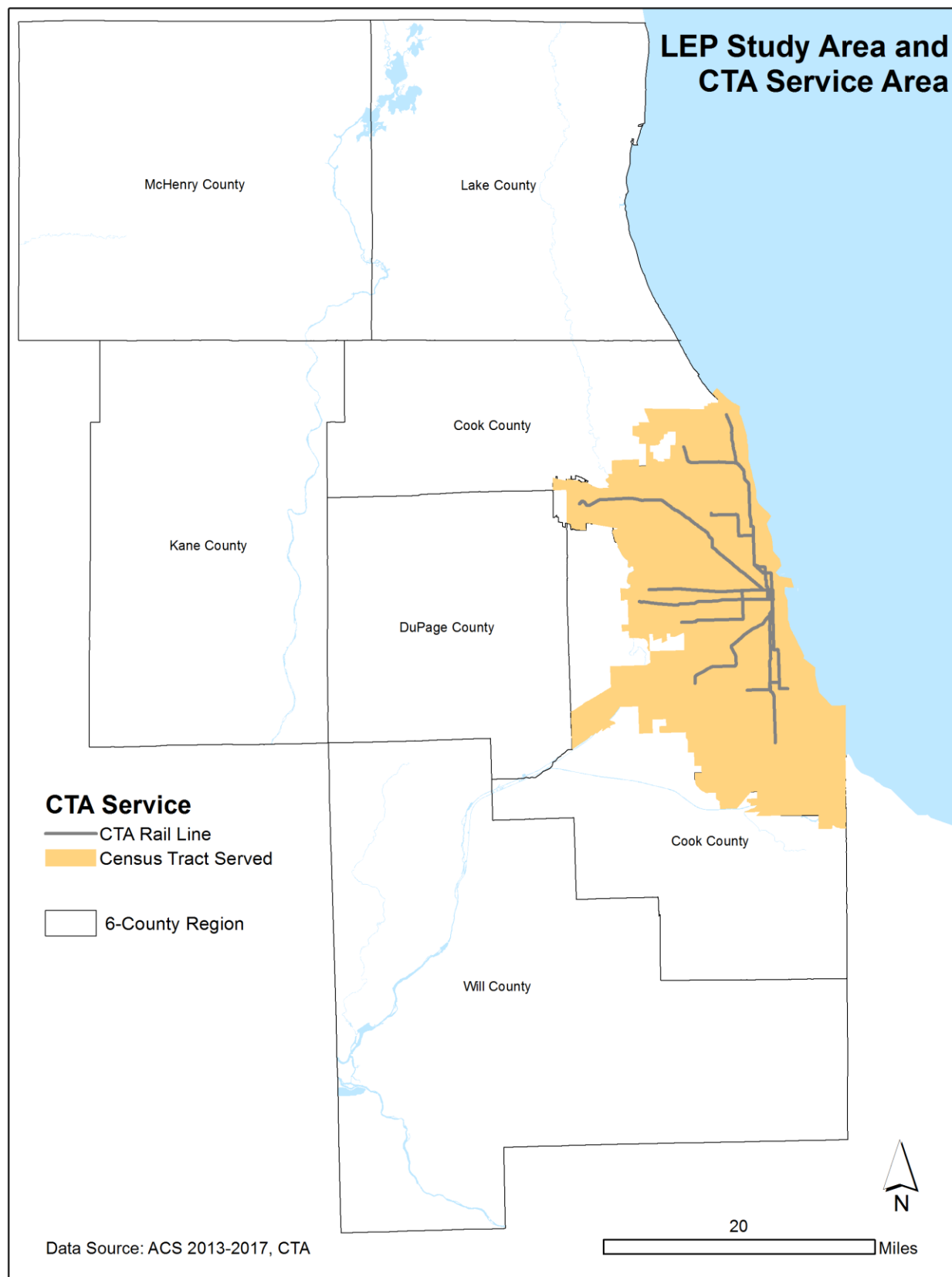


Figure 2:

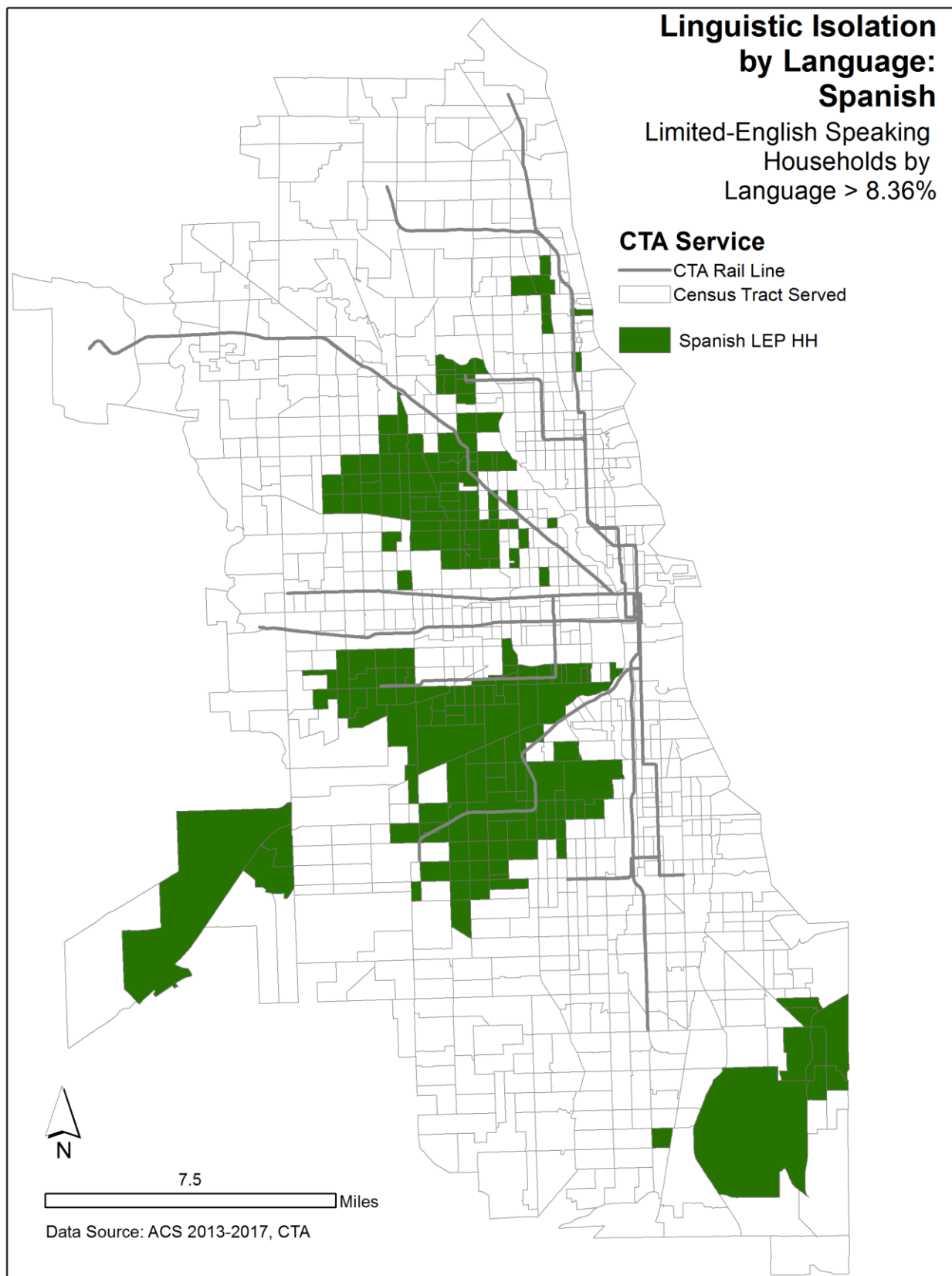


Figure 3:

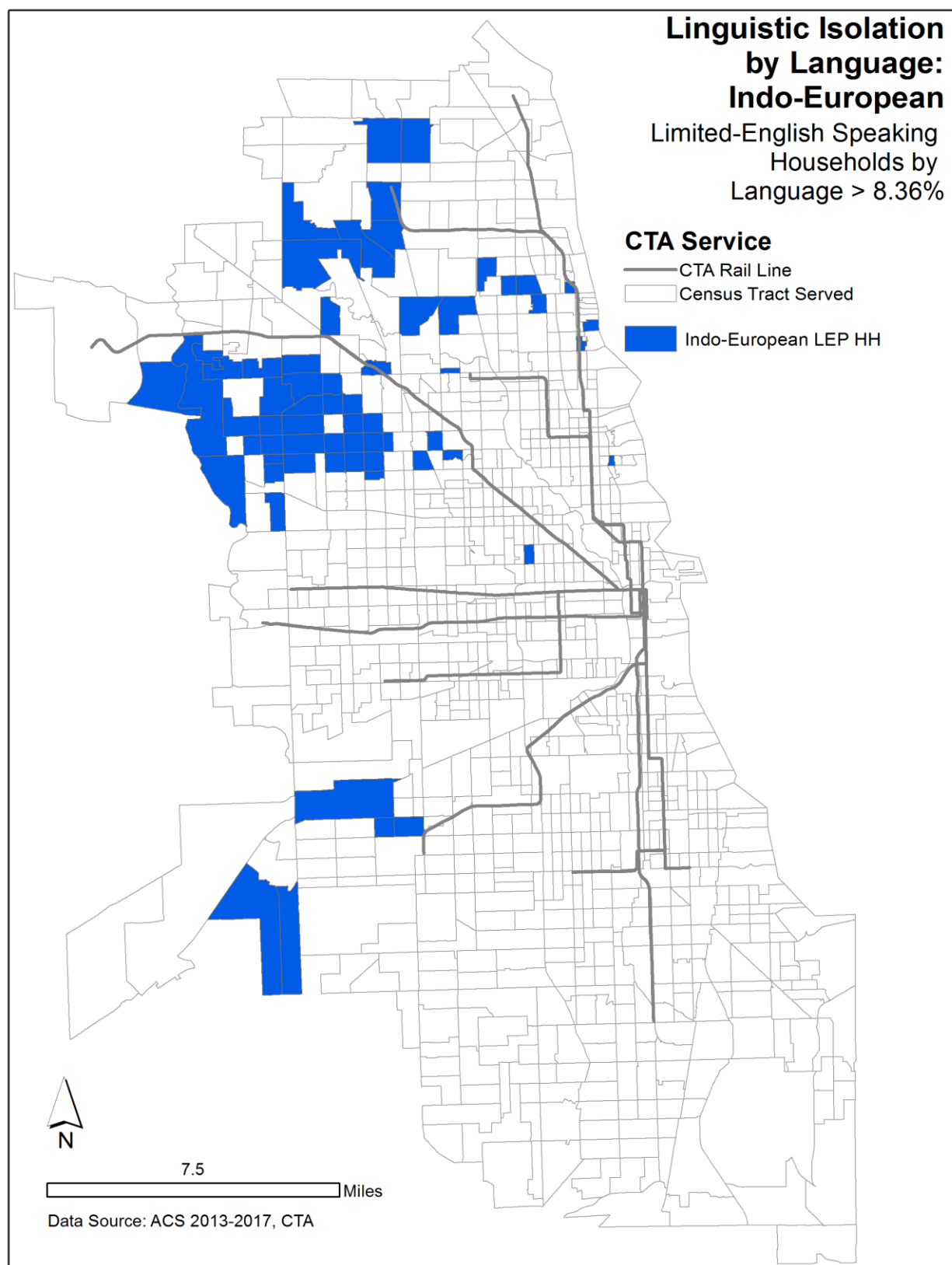
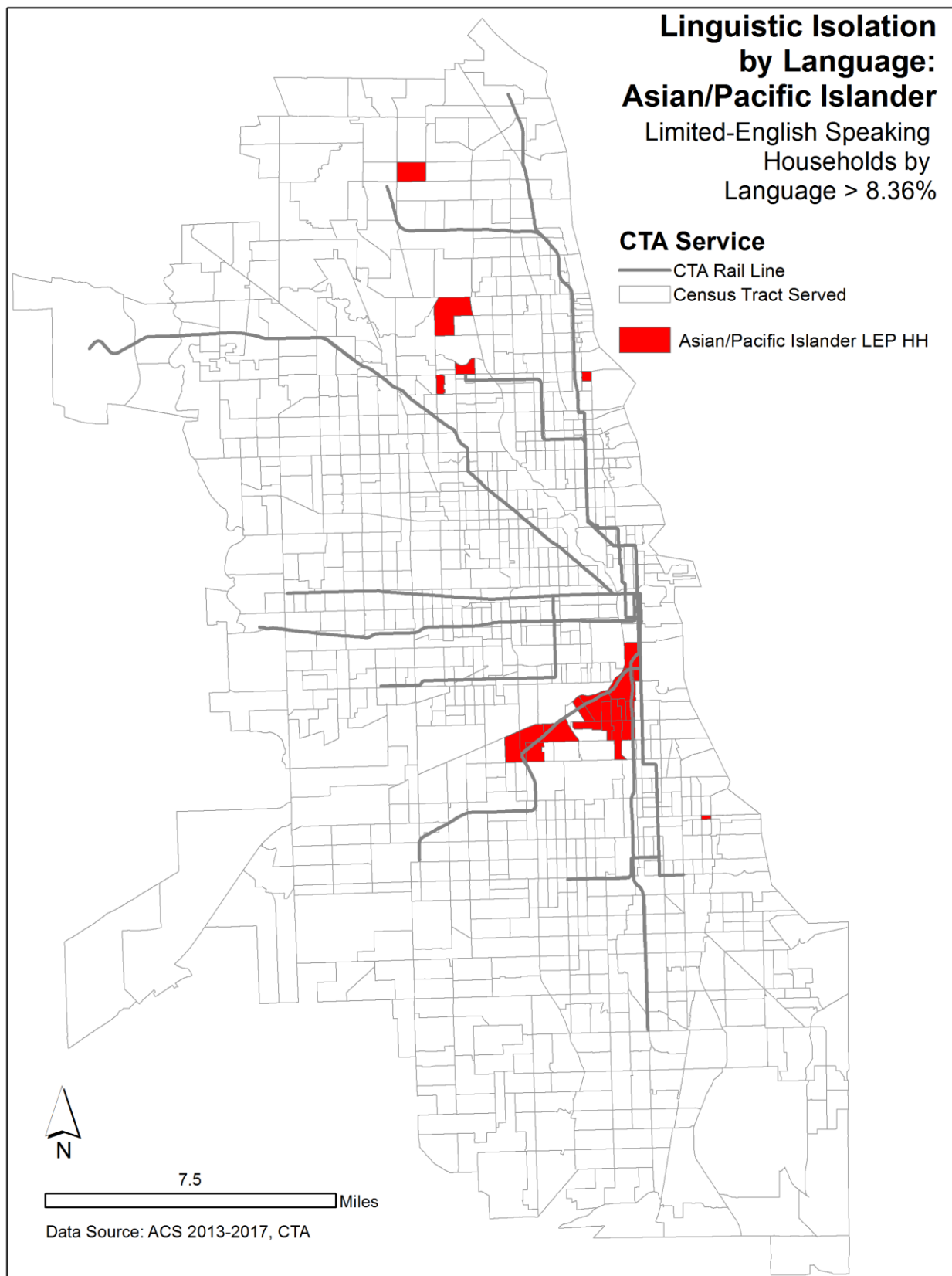


Figure 4:



Chicago Transit Board / ADA Advisory Committee Membership

The Chicago Transit Board consists of seven members, with four appointed by the Mayor of Chicago and three appointed by the Governor of Illinois. The Mayor's appointees are subject to the approval of the Governor and the Chicago City Council. The Governor's appointees are subject to the approval of the Mayor and the Illinois State Senate. The ADA Advisory Committee was established by the authority of the Chicago Transit Board. It serves in an advisory capacity to the CTA. Its purpose is to provide the CTA with recommendations on CTA's compliance with the Americans with Disabilities Act (ADA), facilitate a dialogue between CTA and the disability community, and increase the use of CTA's services by people with disabilities.

The ADA Advisory Committee consists of up to 12 members and is chosen from qualified applicants by the Chairman of the Chicago Transit Board, based on their ability to represent a cross section of the community of people with disabilities in the Chicago metropolitan area. Efforts are made to encourage minority representation in these two planning and advisory bodies.

Table 9 below displays the membership of the Chicago Transit Board and ADA Advisory Committee as of December 1, 2018 and is broken down by race and compared to the population of CTA's service area.

Chicago Transit Board and ADA Advisory Committee Membership								
Board	# of Members	Vacant	White	Black	Hispanic	Asian	AI/AN	Other
CTA Service Area Population	3,488,072	0%	33%	31%	29%	6%	0%	1%
Chicago Transit Board	7	0%	14%	43%	43%	0%	0%	0%
ADA Advisory Committee	9	7%	66%	27%	0%	0%	0%	0%

Table 9: Chicago Transit Board and ADA Advisory Committee Membership

CTA Transit Board Members

Terry Peterson Appointed by Mayor, Expiration: September 2020, Alejandro Silva, Appointed by Mayor, Expiration: September 2022, Kevin Irvine, Appointed by Mayor, Expiration: September 2021, Arabel Alva Rosales, Appointed by Governor, Expiration: September 2021, Rev. Johnny L. Miller, Appointed by Mayor, Expiration: September 2021, Rev. Dr. L. Bernard Jakes, Appointed by Governor Expiration: August 2025 and Judge Gloria Chevere, Appointed by Governor, Expiration: August 2023.

ADA Advisory Committee

Joe Albritton, Adam Ballard, Pamela Berman, Phyllis Buchanan, Melissa Fuller, Bridget Hayman, Whitney Hill, Michele Lee and CTA Employee Director of ADA, Amy Serpe.

Monitoring of Sub-Recipients

During this reporting period CTA does not have any sub-recipients, and is not required to monitor for compliance with Title VI regulations.

Documentation of Board Review and Approval of Title VI Program Triennial Report

In accordance with FTA Title VI Circular 4702.1B, CTA takes its Title VI Program Triennial Report to the Chicago Transit Board for approval. The approved document from 2017 can be found in Appendix E.

SERVICE STANDARDS AND POLICIES

Overview and Objectives

CTA has revised its Service Standards and Policies in accordance with FTA Title VI Circular 4702.1B regarding requirements and guidelines for compliance with Title VI of the Civil Rights Act of 1964 (Title VI). CTA's Service Standards and Policies, adopted in September 2014 and revised in March 2020, can be found in Appendix F.

These standards and policies address how service is distributed across the transit system and ensure that the manner of the distribution affords users access to these assets. CTA regularly monitors its adherence to these standards and policies and will report to the FTA on its adherence as it relates to Title VI every three years as required by the circular.

This document sets service standards for vehicle load, vehicle headway, on-time performance and service availability for both the bus and rail networks.

Service Standards

This document sets service standards for vehicle load, vehicle headway, on-time performance and service availability for both the bus and rail networks.

Vehicle Load Standard

The vehicle load standard is used to determine if buses and trains are overcrowded. The load standard is 53 passengers per bus for the 40-foot bus fleet, 79 passengers per bus for 60-foot bus fleet and 80 passengers per car for the rail fleet.

Loads are measured at the most crowded point on all bus routes and rail lines by half-hour period and compared against the load standard. The load standards are not the maximum capacity of the given vehicle types, rather they are set at levels that provide a reasonable amount of comfort for customers on their daily commutes. Any routes and time periods that exceed these standards on a regular basis should be targeted for improved service.

Loads are reported for the bus fleet using Automatic Passenger Counter technology, which counts how many passengers enter and exit the buses at each stop and calculates the resulting loads. Loads are reported for the rail fleet using the CTA's Rail Origin-Destination model, which estimates loads based on fare card entries into the rail system.

Vehicle Headway Standard

Vehicle headway is defined as the amount of time between two vehicles traveling in the same direction on a given line or combination of lines.

The standard for maximum vehicle headway on both the bus and rail networks is to operate 30 minutes or better at all times of the day.

In addition to this system-wide maximum headway, CTA has vehicle headway standards covering the more heavily ridden time periods on the Key Route bus network and the rail network.

The Key Route bus network was established to ensure that customers across the more densely populated parts of the service area with high transit usage can readily access bus routes meeting more stringent frequency standards. Routes in the Key Route network are typically spaced one mile apart, which allows for approximately a 1/2-mile journey to reach a route in this network. The Key Route bus network and the service area are defined in the appendix of the CTA Service Standards and Policies.

The vehicle headway standard for the Key Route bus network is to operate at least every 10 minutes during the weekday peak periods, 15 minutes during the weekday midday period, 20 minutes during the weekday evening period, 15 minutes on Saturday afternoons and 20 minutes on Sunday afternoons. These time periods are defined in the appendix of the CTA Service Standards and Policies.

The vehicle headway standard for the rail network is to operate at least every 10 minutes during the weekday peak periods, 15 minutes during the weekday midday and evening periods and 15 minutes on Saturday and Sunday afternoons.

Service operates more frequently than the headway standards based on ridership demand and meeting the vehicle load standards.

Minor exceptions to all headway standards are permitted for the purposes of scheduling practicality and improved efficiency.

On-time Performance Standard

CTA's on-time performance standard includes criteria for when a bus or train is considered on time and a threshold of acceptable performance in meeting these criteria.

Bus Network

A bus is considered to be on time if it is no more than one minute early and no more than five minutes late. CTA's goal is to have 65% of customers on every route be able to board on-time buses.

Rail Network

For the rail network, on-time performance is based on meeting the scheduled headway rather than meeting specific arrival or departure times. For service scheduled to operate more frequently than every ten minutes, a train is considered on time if the actual headway of that trip is between one-half and one-and-a-half times the scheduled headway. For service operating every ten minutes and less frequently, a train is considered on time if the actual headway is within 5 minutes of the scheduled headway. CTA's goal is to have 85% of customers on every line be able to board an on-time train.

The method of monitoring rail on-time performance based on scheduled headway is used because headway adherence data is more readily available for the rail network than schedule adherence data, allowing for more complete monitoring and reporting. Maintaining scheduled headways ensures that customers are receiving scheduled service levels.

For bus routes and rail lines not meeting these thresholds, attention will be focused on improving reliability on more heavily ridden routes first in order to ensure CTA's resources are focused on maintaining scheduled service levels in a way that benefits the most customers possible.

Service Availability Standard

The service availability standard is based on customer travel distances to reach transit. Customers throughout the service area should be able to travel a half mile or less to reach the nearest transit service.

Service Policies

This document sets service policies for the distribution of transit amenities and vehicle assignment for both the bus and rail systems.

Transit Amenities Policy

Printed station signage is provided at every rail station indicating the station name and the rail line(s) serving the station. Timetables, a bus and rail system map and digital next train signage are placed at every station.

Printed signage is provided at every bus stop indicating the route(s) serving the stop, route destination, days of operation and basic span-of-service information.

Installation of other transit amenities including seating, waste receptacles, rail shelters and platform canopies, escalators and elevators are based on the number of passenger boarding's at the given stop or station.

The CTA does not have decision-making authority over the siting of bus shelters as this program is managed by the City of Chicago. For this reason there is no service policy regarding the siting of bus shelters.

Vehicle Assignment Policy

Vehicle assignment refers to the process by which transit vehicles are placed into service at bus garages and rail lines throughout CTA's system.

CTA's fleet consists of rail cars, 40-foot buses and 60-foot buses, all of which are air-conditioned and accessible. All buses are low-floor, equipped with bike racks and make voice and text announcements for all bus stops through the Automated Vehicle Announcement System. All rail cars make automated voice announcements for all stations.

CTA's vehicle assignment policy is to allocate the 40-foot and 60-foot bus fleet based on ridership and to maintain a uniform vehicle age by fleet size across all garages in the system. On the rail network the policy is to maintain a uniform fleet age across all rail lines.

Changes to Key Route Bus Network

As part of CTA's Title VI Triennial Report 2016-2018, CTA's Service Standards and Policies are amended to reflect changes to the Key Route bus network made since 2016. These changes include (1) the addition of the #X9 Ashland Express and #X49 Western Express and (2) the introduction of route #95 95th, which resulted from the combination of the former routes #95E 93rd-95th and #95W West 95th. The #95E and #95W were both previously key routes.

Including the #X9, #X49, and #95 in the Key Route Network should benefit customers, in that Key routes are priority routes where investments in improvements provide the greatest potential for increased ridership.

04 MONITORING OF SERVICE STANDARDS AND POLICIES

Overview

Operating the nation's second largest public transportation system, CTA monitors performance of the bus network and rail system every three years relative to the CTA Service Standards and Policies to ensure the end result of policies and decision-making is equitable.

Vehicle Load and Headway, On-time Performance, and Service Availability of both minority and non-minority bus routes and rail lines are assessed by comparing service to the established CTA service standards as stated in FTA Title VI Circular 4702.1B.

Distribution of Transit Amenities and Vehicle Assignments of both minority and non-minority bus routes and lines are assessed by comparing service to the established CTA service policies as stated in FTA Title VI Circular 4702.1B.

Service Standards

Vehicle Load Monitoring

Passenger loading levels of minority and non-minority bus routes and rail lines were analyzed during years 2016, 2017 and 2018 in order to determine compliance with the CTA service standards.

Bus Load Monitoring

CTA continually monitors loading levels and makes regular adjustments to bus service four times a year to address service related issues. In order to address crowding, 109 service related improvements were made to the bus network during years 2016, 2017 and 2018.

Table 10 below displays the proportion of bus customers experiencing loading levels that either meet or are above the CTA service standards and if a disparate impact occurred.

BUS LOAD MONITORING					
YEAR	MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER ¹
	MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
FALL 2016	97.5%	2.5%	93.5%	6.5%	-4.0%
FALL 2017	97.8%	2.2%	93.1%	6.9%	-4.7%
FALL 2018 ²	98.6%	1.4%	95.5%	4.5%	-3.1%

Table 10: Bus Load Monitoring

¹ A negative percentage (%) indicates non-minority customers are affected more than minority customers.

² Missing Fall 2018 data was replaced with spring 2018 data for routes #8 Halsted and #9 Ashland.

Findings

Based on the Table above, minority bus riders were not disparately impacted during years 2016, 2017, and 2018. CTA's Disparate Impact Policy states a disparate impact occurs if the percentage of minority riders or vehicle revenue hours affected is at least fifteen percentage points (15%) higher than the percentage of non-minority riders or vehicle revenue hours affected.

Rail Load Monitoring

CTA continually monitors loading levels and makes regular adjustments to rail service twice per year to address any service related issues. When and where crowding appears, CTA makes service adjustments, with 9 service-related improvements to the rail network during years 2016, 2017, and 2018.

Table 11 below displays the proportion of rail customers experiencing loading levels that either meet or are above the CTA service standards and if a disparate impact occurred.

RAIL LOAD MONITORING					
YEAR	MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER ¹
	MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
FALL 2016	99.3%	0.7%	97.6%	2.4%	-1.7%
FALL 2017	99.1%	0.9%	95.9%	4.1%	-3.2%
FALL 2018	98.8%	1.2%	96.0%	4.0%	-2.8%

Table 11: Rail Load Monitoring

¹ A negative percentage (%) indicates non-minority customers are affected more than minority customers.

Findings

Based on Table 11 above, minority rail riders were not disparately impacted during years 2016, 2017, and 2018. CTA's Disparate Impact Policy states a disparate impact occurs if the percentage of minority riders or vehicle revenue hours affected is at least fifteen percentage points (15%) higher than the percentage of non-minority riders or vehicle revenue hours affected.

Vehicle Headway Monitoring

Passenger headway levels of both minority and non-minority bus routes and rail lines were analyzed during years 2016, 2017, and 2018 in order to determine compliance with the CTA service standards.

Bus Headway Monitoring

CTA manages service by balancing appropriate crowding levels while maintaining minimum headways.

Table 12 below displays the proportion of bus customers experiencing headway levels that either meet or are above the CTA service standards and if a disparate impact occurred.

BUS NETWORK HEADWAY MONITORING					
YEAR	MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER ¹
	MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
FALL 2016	96.1%	3.9%	95.9%	4.1%	-0.1%
FALL 2017	96.3%	3.7%	96.1%	3.9%	-0.3%
FALL 2018	96.2%	3.8%	96.2%	3.8%	0.0%

Table 12: Bus Network Headway Monitoring

¹ A negative percentage (%) indicates non-minority customers are affected more than minority customers.

Findings

Based on Table 12 above, minority bus riders were not disparately impacted during years 2016, 2017, and 2018. CTA's Disparate Impact Policy states a disparate impact occurs if the percentage of minority riders or vehicle revenue hours affected is at least fifteen percentage points (15%) higher than the percentage of non-minority riders or vehicle revenue hours affected.

Rail Headway Monitoring

Table 13 below displays the proportion of rail customers experiencing headway levels that either meet or are above the CTA service standards and if a disparate impact occurred.

RAIL HEADWAY MONITORING					
YEAR	MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER ¹
	MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
FALL 2016	99.0%	1.0%	97.8%	2.2%	-1.2%
FALL 2017	99.0%	1.0%	97.5%	2.5%	-1.5%
FALL 2018	98.8%	1.2%	97.8%	2.2%	-1.0%

Table 13: Rail Headway Monitoring

¹ A negative percentage (%) indicates non-minority customers are affected more than minority customers.

Findings

Based on the table above, minority rail riders were not disparately impacted during years 2016, 2017 and 2018. CTA's Disparate Impact Policy states a disparate impact occurs if the percentage of minority riders or vehicle revenue hours affected is at least fifteen percentage points (15%) higher than the percentage of non-minority riders or vehicle revenue hours affected.

On-Time Performance Monitoring

On-time performance of both minority and non-minority bus routes and rail lines were analyzed during years 2016, 2017, and 2018 in order to determine compliance with the CTA service standards.

Bus Network Monitoring

Table 14 below displays the proportion of bus customers experiencing on-time performance levels that either meet or are above the CTA service standards and if a disparate impact occurred.

BUS ON-TIME PERFORMANCE MONITORING					
YEAR	MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER ¹
	MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
FALL 2016 ²	22.3%	77.7%	22.8%	77.2%	0.5%
FALL 2017	18.2%	81.8%	25.9%	74.1%	7.6%
FALL 2018	12.3%	87.7%	15.4%	84.6%	3.1%

Table 14: Bus On-Time Performance Monitoring

¹ A negative percentage (%) indicates non-minority customers are affected more than minority customers.

² Routes #31 31st, #95 95th, and #112 Vincennes/111th are not included in the Fall 2016 data as data was not available. Spring 2016 data was also not available for these routes.

Findings

Based on **Table 14** above, minority bus riders were not disparately impacted during years 2016, 2017, and 2018. CTA's Disparate Impact Policy states a disparate impact occurs if the percentage of minority riders or vehicle revenue hours affected is at least fifteen percentage points (15%) higher than the percentage of non-minority riders or vehicle revenue hours affected.

Rail Network Monitoring

Table 15 below displays the proportion of rail customers experiencing on-time performance levels that either meet or are above the CTA service standards and if a disparate impact occurred.

RAIL ON-TIME PERFORMANCE MONITORING					
YEAR	MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER ¹
	MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
FALL 2016	100.0%	0.0%	77.5%	22.5%	-22.5%
FALL 2017	100.0%	0.0%	82.8%	17.2%	-17.2%
FALL 2018	100.0%	0.0%	77.0%	23.0%	-23.0%

Table 15: Rail On-Time Performance Monitoring

¹ A negative percentage (%) indicates non-minority customers are affected more than minority customers.

Findings

Based on the table above, minority train riders were not disparately impacted during years 2016, 2017, and 2018. CTA's Disparate Impact Policy states a disparate impact occurs if the percentage of minority riders or vehicle revenue hours affected is at least fifteen percentage points (15%) higher than the percentage of non-minority riders or vehicle revenue hours affected.

CTA's Disparate Impact Policy states a disparate impact occurs if the percentage of minority riders or vehicle revenue hours affected is at least fifteen percentage points (15%) higher than the percentage of non-minority riders or vehicle revenue hours affected.

Service Availability Monitoring

Service availability for the CTA system was analyzed in order to determine compliance with the CTA service standards.

Table 16 below displays the proportion of households served experiencing service availability levels that either meet or are above the CTA service standards and if a disparate impact occurred.

SERVICE AVAILABILITY MONITORING				
MINORITY		NON-MINORITY		DISPARATE IMPACT EXISTS IF PERCENTAGE IS 15% OR HIGHER ¹
MEETS STANDARD	DOES NOT MEET STANDARD	MEETS STANDARD	DOES NOT MEET STANDARD	
99.71%	0.29%	99.08%	0.92%	-0.6%

Table 16: Service Availability Monitoring

¹ A negative percentage (%) indicates non-minority customers are affected more than minority customers.

Findings

Based on the table above, minority households served are not disparately impacted. CTA's Disparate Impact Policy states a disparate impact occurs if the percentage of minority riders or vehicle revenue hours affected is at least fifteen percentage points (15%) higher than the percentage of non-minority riders or vehicle revenue hours affected.

Service Policies

Transit Amenities Distribution

Maps displaying the distribution of transit amenities, such as park and rides, bus turnarounds, canopies, elevators, bus shelters, digital+ and conventional signage, seating, escalators, and waste receptacles can be found in Appendix G.

Vehicle Assignment Distribution

Vehicle assignments of both minority and non-minority bus routes for each bus vehicle size as well as vehicle assignments of both minority and non-minority rail lines were analyzed during years 2016, 2017, and 2018 in order to determine compliance with the CTA service policies.

Tables 17 below displays the average age of bus vehicle assignments by fleet type and rail vehicle assignments experienced by both minority and non-minority bus and rail customers.

BUS VEHICLE ASSIGNMENT MONITORING (AVERAGE AGE)				
YEAR	MINORITY	NON-MINORITY	MINORITY	NON-MINORITY
	40 FOOT		60 FOOT	
FALL 2016	7.1	12.1	6.9	5.3
FALL 2017	7.9	10.3	7.9	6.4
FALL 2018	8.7	9.0	8.9	7.4

RAIL VEHICLE ASSIGNMENT MONITORING (AVERAGE AGE)		
YEAR	MINORITY	NON-MINORITY
2017	9.9	16.7
2017	10.9	17.7
2018	11.8	17.8

Table 17: Bus and Rail Vehicle Assignment Monitoring

CTA tracks bus fleet age across the agency's seven garages to ensure that minority populations are not disparately impacted and that minority route riders are given the same vehicle experience as those on non-minority routes. In addition to being a key component of ensuring equal access, careful monitoring of the bus fleet at each garage helps CTA optimize its maintenance and operation practices. Minimizing the variation in bus models by garage familiarizes mechanics with particular bus models and minimizes inventory needs for spare parts. Since buses are purchased in large volumes and orders are typically spaced several years apart, concentrating similar bus types at the garages will result in some variation in fleet age between garages.

Policy for the rail network maintains a uniform fleet age across all rail lines. Rail cars are generally assigned in blocks to various lines because each fleet of rail cars has unique equipment and specialized maintenance needs as well as some differences in operation. With small fleets of cars, keeping them together on one line assures that personnel assigned for maintenance and operations are knowledgeable about the cars and will be able to keep them operating while minimizing the need to stock parts in multiple locations. Large fleets of cars are assigned to the largest lines such as Red or Blue.

05 DEMOGRAPHIC ANALYSES

Current Service Profile

Service profile maps based on census tract data and American Community Survey (ACS) 2013-2017 were used to examine the extent of transit service available to minority and low-income populations within the CTA service area.

Maps displaying the geographic coverage of transit service in relationship to the census tracts identified as minority and non-minority and low income and non-low-income level populations based on the service area threshold can be found in Appendix G.

Demographic Ridership and Fare Payment

CTA collects socio-economic and ridership characteristics as well as fare payment information of CTA customers using Customer Satisfaction Surveys (CSS) every three years. The Customer Satisfaction Survey is conducted by the Regional Transportation Authority (RTA) on behalf of CTA, Metra, and Pace. Charts displaying this information can be found in Appendix H.

CTA uses information collected to develop a demographic profile comparing minority riders and non-minority riders, and trips taken by minority riders and non-minority riders. The latest survey was administered in 2016 using both paper-based and web-based instruments. Paper surveys were distributed on board CTA vehicles and completed by customers in one of four ways; onboard and returned to the interviewer, completed later and mailed postage-paid; or completed later online using a URL with a unique ID and password. CTA customers were also recruited electronically to take the web-version of the survey using a CTA customer email list. The paper survey informed customers that the survey could be completed online in Spanish and Polish. A total of 8,908 surveys were completed and returned. Of the 8,908 respondents who successfully completed the survey, 949 were recruited onboard and 7,959 were recruited online, translating into a response rate of 10% and 13%, respectively. The results are valid at the 95% confidence level with a margin of error of +/- 1%. In addition to questions regarding satisfaction, CTA also collected ridership behaviors, and demographics of the customers.

Facilities

CTA did not construct any new facilities, such as a vehicle storage facility, maintenance facility, or operation center, as defined in FTA Title VI Circular 4702.1B during years 2016, 2017, and 2018.

Maps identifying existing facilities as well as recently completed, in-progress, and planned facility improvements or rehab projects in relationship to the census tracts identified as minority and non-minority and low income and non-low-income level populations based on the service area threshold can be found in Appendix I.

06 PUBLIC ENGAGEMENT PROCESS FOR MAJOR SERVICE CHANGE POLICY

The CTA Board approved the Service and Fare Equity Policy in April, 2013. See Appendix K. To satisfy the public participation process requirements for the Service and Fare Equity Policy, CTA staff held public events on March 21 and March 29, 2013. CTA invited members of local community groups focused on the interests of minority and low-income populations to learn more about the proposed policies and discuss any questions or concerns with CTA staff. In addition, a written comment period was scheduled for attendees at events in order to submit comments regarding the proposed Policy to CTA staff via electronic mail or U.S. Mail.

07 SERVICE AND FARE EQUITY ANALYSES

Executive Summary

The Chicago Transit Authority (CTA) implemented fare changes that would become effective on January 7, 2018. It is CTA's objective to deliver service in an equitable and non-discriminatory manner. To that end, in the interest of Title VI requirements and in accordance with CTA's Service and Fare Equity Policy, CTA will avoid, minimize, or mitigate adverse impacts on minority populations or low-income populations when necessary and appropriate.

The results of the analysis are in Appendix K. The Fare Equity analysis shows that the planned fare changes would not cause a disparate impact on minority populations nor would they cause a disproportionate burden on low-income populations.

08 TITLE VI PROGRAM CONCLUSIONS and GOALS LOOKING AHEAD

CTA maintains its commitment to meet the requirements and objectives of the Title VI Program. In addition, CTA continues to look for opportunities to improve its Title VI programs and advance the Authority's mission. During this Triennial Period, the CTA added the position of Title VI Coordinator to specifically focus on Title VI programs. CTA also commissioned the 2019 LEP Study, which identified opportunities for additional support to LEP communities, which will serve to enhance CTA's Title VI Programs for the next Triennial Period. Importantly, Title VI considerations are integrated throughout its decision-making processes.